

Document Log Item

Addressing			
From		To	
David Wilson <David.Wilson@erm.com>		Carmen Santos/R9/USEPA/US@EPA	
CC		BCC	
Christopher Rollins/R9/USEPA/US@EPA Letitia Moore/R9/USEPA/US@EPA John Beach/R9/USEPA/US@EPA "Craig.Wilkinson@Timet.com" <Craig.Wilkinson@Timet.com>			
Description			
Subject		Date/Time	
RE: PCBs: TIMET Conditional Approval		08/23/2012 11:41 AM	
# of Attachments	Total Bytes	NPM	Contributor
0	14,880		Carmen Santos
Processing			
Comments			

Body

Document Body

Hello Carmen:

Thank you for providing EPA's written Conditional Approval Letter, dated August 6, 2012, pertaining to the TIMET J2 Landfill Risk-Based PCB Characterization Work Plan. As per my phone message today, TIMET has requested that I respond to your approval to acknowledge that

the facility is eager to proceed with the boring and sampling program at the landfill. However, we feel one part of Condition 2 in EPA's letter requires clarification.

The middle paragraph of Condition 2 includes the statement, "... ***If the UCL is above the 1 ppm SL, hot spots would be removed to lower the UCL; and after hot spot removal the UCL would be recalculated and again compared to the 1 ppm SL...***"

TIMET understands this sentence to mean that an attempt at hot spot(s) removal would be performed if the calculated UCL exceeds 1 ppm, regardless of where the hot spot(s) are found. This approach appears inconsistent with our conversations during July. TIMET would like to propose the statement below as an alternative to the one listed above:

"If the UCL is above the 1 ppm SL, TIMET and EPA will meet to discuss the characterization data and decide next steps, which may involve hot spot removal or a risk evaluation."

Thank you for your consideration. Upon EPA's acknowledgement of this revision, we will begin the mobilization process and advise EPA when the field work will be performed.

Thank you!

Dave

David S. Wilson, P.E., P.G.

Partner

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From: Carmen Santos [mailto:Santos.Carmen@epamail.epa.gov]
Sent: Friday, August 10, 2012 1:00 PM
To: Craig.Wilkinson@Timet.com
Cc: David Wilson; Christopher Rollins; Letitia Moore; John Beach
Subject: Fw: PCBs: TIMET Conditional Approvalf

Hello Mr. Wilkinson:

I am sorry the actual approval letter did not get attached to the August 9, 2012 message. For your convenience, I have attached both the figure and the letter to this message.

If you have any questions, please call me.

Thank you for your courtesies.

Sincerely,
Carmen

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the things you can think up if only you try!" Dr. Seuss

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----- Forwarded by Carmen Santos/R9/USEPA/US on 08/10/2012 11:41 AM -----

From: Carmen Santos/R9/USEPA/US
To: Craig.Wilkinson@Timet.com,
Cc: David.Wilson@erm.com, Christopher Rollins/R9/USEPA/US@EPA, Letitia Moore/R9/USEPA/US@EPA, John Beach/R9/USEPA/US@EPA
Date: 08/09/2012 06:25 PM
Subject: PCBs: TIMET Conditional Approvalf

Hello Mr. Wilkinson:

I was under the impression that I had sent via electronic mail the signed August 6, 2012 letter approving the J-2 Landfill Risk-Based PCB Characterization Work Plan. Attached is the pdf containing the conditional approval letter. The letter was mailed to you via USPS on August 6, 2012.

[attachment "J2_Landfill.pdf" deleted by Carmen Santos/R9/USEPA/US]

If you have any questions, please call me.

Thank you for your courtesies.

Sincerely,
Carmen

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
santos.carmen@epa.gov

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